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July 29, 2019

BY ECF

The Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Jane Doe, et al. v. The Trump Corporation, et al., 18-cv-09936 (LGS)

Dear Judge Schofield:

We write on behalf of Plaintiffs in the above-captioned action in connection with the Court's Order dated July 25, 2019 (ECF No. 98), which scheduled a status conference for August 8, 2019. Unfortunately, counsel for Plaintiffs will be out of the country on August 8. Accordingly, pursuant to Rule I.B.2 of Your Honor's Individual Rules and Procedures for Civil Cases, we write to respectfully request the conference be adjourned to August 16, 2019 or, if the Court is not available on August 16, 2019, to August 14, 2019. No previous requests have been made for adjournment and Defendants do not object to Plaintiffs' request.

In addition, Defendants respectfully request that the Court adjourn the date by which Defendants must Answer the Amended Complaint, from August 7, 2019, until 21 days after the date of the next conference in this matter. Plaintiffs have no objection to Defendants' request.

Finally, in advance of the joint letter due Thursday, Plaintiffs note that they have sent to defense counsel a proposed order relating to pseudonymity and confidentiality as discovery commences and have asked Defendants for their positions with respect to certain aspects thereof. Defense counsel have taken the position that it is premature to negotiate the terms of the confidentiality agreement at this time and have advised that they will meet and confer with Plaintiffs further on this subject with sufficient time in advance of the conference for the parties to be in a position to address confidentiality issues with the Court at that time. This refusal to negotiate until the eve of the conference makes it difficult for Plaintiffs to accurately state the position of the parties on these issues in the letter due Thursday. Accordingly, Plaintiffs will state

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their position in the letter and look forward to addressing these issues with the Court at the upcoming conference.

Respectfully submitted,



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